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*Attorneys for T1 Payments LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

GAIA ETHNOBOTANICAL, LLC dba  
MITRAGAIA,

Plaintiff,

vs.

T1 PAYMENTS LLC, PAYVISION, B.V.,  
AND DOES 1-10 AND ROE  
CORPORATIONS 1-10,

Defendants.

Case No.: 2:22-cv-01046-CDS-NJK

**MOTION FOR VENABLE LLP TO  
WITHDRAW AS COUNSEL WITH  
CLIENT CONSENT**

Pursuant to LR IA 11-6(b) and Nevada Rule of Professional Conduct 1.16(a)(3), Ari N. Rothman of the law firm Venable LLP hereby requests leave from the Court to withdraw as counsel for defendant T1 Payments LLC in this matter because T1 Payments LLC discharged undersigned counsel on November 11, 2022. Aaron Shipley of McDonald Carano LLP will remain counsel of record for T1 Payments LLC.

Nevada Rule of Professional Conduct 1.16(a)(3) that “a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if... (3) The lawyer is discharged.” T1 Payments LLC discharged undersigned counsel on November 11, 2022. Accordingly, unless otherwise ordered by the Court, undersigned counsel must withdraw from the representation of these parties.

T1 Payments LLC will not be prejudiced by Venable’s withdrawal. Aaron Shipley of McDonald Carano will remain as counsel of record for T1 Payments LLC. Further, this case is

1 stayed per the Court's order at ECF No. 49, discovery has not begun, and no pretrial conference or  
2 trial dates have been set. No motions are pending to which T1 Payments LLC must respond.  
3 Accordingly, Venable's withdrawal will not result in delay of discovery, the trial, or any hearing in  
4 the case. LR IA 11-6(e).

5 Venable LLP served a copy of this motion by email, mail, and Federal Express as set forth  
6 in the attached certificate of service. Venable LLP also emailed a draft of this motion before filing  
7 it.

8 For these reasons, Venable requests that the Court will grant it leave to withdraw as counsel  
9 to T1 Payments LLC.

10  
11 Dated this 14th day of November, 2022.

12 VENABLE LLP

13  
14 By: /s/ Ari N. Rothman

15 Ari N. Rothman (NSBN 15806)  
16 600 Massachusetts Avenue, N.W.  
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18 *Attorneys for T1 Payments LLC*

19 IT IS SO ORDERED.

20 Dated: November 14, 2022

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25 Nancy J. Koppe  
26 United States Magistrate Judge  
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